

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Gorski & Knowlton PC

By: Carol L. Knowlton, Esquire

311 Whitehorse Ave, Suite A

Hamilton, New Jersey 08610

(609) 964-4000

(609) 528-0721 - facsimile

cknowlton@gorskiknowlton.com

Attorneys for Debtor(s)

In Re:

PV Pets, LLC

Debtor(s)

Chapter 11

Case No. 24-15472-JNP

Judge: Jerrold N. Poslusny, Jr.

**NOTICE OF MOTION AGAINST HIGHLAND HILL CAPITAL, LLC AND MYNT ADVANCE
FOR WILLFUL VIOLATION OF THE AUTOMATIC STAY PROVISIONS OF 11 U.S.C. §362(a)**

TO:

Kevin P. Callahan, Esquire
Office of the United States Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

Nicole M. Nigrelli, Esquire
Ciardi, Ciardi & Astin
1905 Spruce Street
Philadelphia, PA 19103
Subchapter V Trustee

President/Managing Member
Mynt Advance
633 167th Street
N. Miami Beach, FL 33162
Creditor

Highland Hill Capital LLC
1100 Park Central Blvd. S., Suite 1200
Pompano Beach, FL 33064
Creditor

Omega Recovery Group, LLC
o/b/o Highland Hill Capital
420 Central Avenue
Cedarhurst, NY 11516
Creditor

Jacob Z. Weinstein, Esquire
420 Central Avenue, Ste. 301
Cedarhurst, NY 11516
Attorney for Highland Hill Capital

PLEASE TAKE NOTICE that the undersigned, as counsel for the Debtor, PV Pets, LLC, shall move before the Honorable Jerrold N. Poslusny, Jr., U.S.B.J., United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, on the ____ day of June, 2024 at ____:00 in the forenoon, or as soon thereafter as counsel may be heard for an Order imposing sanctions against the creditors, Highland Hill Capital, LLC, and Mynt Advance for willful violation of the automatic stay provisions of 11 U.S.C. §362(a) and compelling return of funds taken.

In support of this motion, the undersigned shall rely upon the annexed certification, letter brief, and oral argument if timely opposition is filed.

Any opposition to this motion must be filed and served so as to be received at least seven (7) days prior to the hearing date.

GORSKI & KNOWLTON PC
Attorneys for Debtor
/s/ Carol L. Knowlton

By: _____
CAROL L. KNOWLTON

Dated: June 20, 2024